

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY,

Plaintiff,

Case No. 2:14-cv-10266-SJM-LJM  
Hon. Judith E. Levy  
Mag. Judge David R. Grand

v.

UNIVERSAL HEALTH GROUP, INC.  
A/K/A MICHIGAN SPINE AND REHAB,  
UHG MANAGEMENT, LLC,  
PROFESSIONAL HEALTH SYSTEMS,  
LLC A/K/A PROFESSIONAL MEDICAL  
BILLING, LLC, SCOTT P. ZACK, D.C.,  
DAVID M. KATZ, D.C.,  
LOREN C. CHUDLER, D.O.,  
JOSEPH F. DESANTO, HORIZON  
IMAGING, LLC, CLEAR IMAGING, LLC,  
JEFF S. PIERCE, D.O.,  
THOMAS D. CARUSO, D.O., and  
KATHERINE H. KARO, D.O.,

Defendants.

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**DEFENDANTS HORIZON IMAGING, LLC'S AND  
CLEAR IMAGING, LLC'S CONCURRENCE AND JOINDER IN  
DEFENDANTS KATZ'S AND ZACK'S REPLY BRIEF IN SUPPORT OF  
THEIR MOTION TO DISMISS [DOCKET NO. 64], AND  
SUPPLEMENTATION THERETO**

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Defendants, HORIZON IMAGING, LLC and CLEAR IMAGING, LLC (“Horizon” and “Clear”), by and through their attorneys, Stark Reagan, PC, concur, adopt, and incorporate herein by reference as if fully set forth all of the issues, arguments, cited opinions, legal analysis, and conclusions set forth in Defendants David Katz’s and Scott Zack’s Reply Brief in Support of their Motion to Dismiss [Docket No. 64]. The issues and law set forth in that Reply Brief [Docket No. 64] are common to the issues pertaining to Horizon and Clear, and in the interest of judicial economy there is no need to separately repeat them *in toto* here.

As such, Defendants Horizon and Clear request dismissal of all counts against them for the reasons set forth here and in Defendants David Katz’s and Scott Zack’s Reply Brief in Support of Their Motion to Dismiss [Docket No. 64]. If requested by the Court, Horizon and Clear will further supplement their positions.

**STARK REAGAN**

/s/ Peter L. Arvant

PETER L. ARVANT (P52809)

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LLC and Clear Imaging, LLC

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Date: June 16, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that on June 16, 2014, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will send notification of such filing to all parties of record.

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Jessica Foster  
JESSICA FOSTER

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